

Modern Slavery Report

Our structure

We are a provider of platform investment services in the financial sector operating in the UK. We have created a technology solution that's digital first, future proofed and built entirely around advisers and the ever evolving and complex needs of their clients to deliver great customer outcomes and real value for money.

We offer a wide range of product solutions including ISAs, general investment accounts and SIPPs, and an open architecture approach to investments providing access to a broad range of over 6,000 investment solutions including funds and listed securities.

We remain committed to preventing modern slavery and human trafficking within our business and supply chains and recognise the importance of upholding human rights and ethical standards in all aspects of our operations as a provider of platform investment services regulated by the Financial Conduct Authority.

This statement applies to Novia Financial (Holdings) Limited, Novia Financial Plc and Wealthtime Limited (the 'Wealthtime Group').

Our people and supply chains

The Wealthtime Group has over 250 employees based in London, Salisbury, and Bath who are paid at least the National Living Wage. Our onboarding processes include pre-employment background screening on all new employees and contractors, and we use reputable and trusted agencies for recruitment. As such, we believe there is a low risk of human slavery or forced labour in our direct workforce.

We are partners with over 500 suppliers that are predominately based across the UK, but also mainland Europe, Australia, and the US, from whom we source services and products that are critical to the delivery of our operations. These services range from utilities run by local small business owners to global enterprises providing technology infrastructures which are crucial to the platform.

Our policies on slavery and human trafficking

We have zero tolerance to slavery and human trafficking. Our behaviours and purpose are underpinned by a set of corporate policies supporting our commitment to high ethical standards.

Our adherence to these policies is subject to regular reviews to help us to continuously improve in this area:

- **Supplier Code of Conduct:** Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious breaches of the Supplier Code of Conduct may lead to the termination of the business relationship.
- **Whistleblowing Policy:** Our policy encourages concerns that are related to the direct activities of our business and its supply chains to be reported. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our Whistleblowing procedure is designed to make it easy for our people to make disclosures, without fear of retaliation.
- **Anti-Bribery Policy:** We uphold the highest ethical standards and have zero tolerance for bribery and corruption. Our anti-bribery policy outlines clear guidelines and expectations in respect of anti-bribery.

Through these policies, we strive to create a culture of integrity and responsibility, safeguarding against modern slavery and bribery to uphold our commitment to ethical business.

Due Diligence processes for slavery and human trafficking

As a provider of investment services, we maintain a comprehensive framework to combat money laundering and/or other financial crime and have a dedicated Money Laundering Reporting Officer to help identify any form of money laundering or other financial crime that may facilitate modern slavery.

We also carry out due diligence on our supply chain, as part of this process we consider, flag, and rectify any risks associated with modern slavery and human trafficking. We also have a robust contract sign off process which is followed when we enter into or renew contracts. This provides assurance to our senior leadership team that appropriate due diligence has been undertaken, all risks have been considered, and appropriate contractual provisions reflecting those risks are in place.

Awareness and training

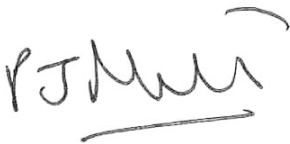
We expect our people to act in a transparent, honest, and ethical way and we require them to take personal responsibility for reporting any instances of actual or suspected wrongdoing.

We shall be publishing a modern slavery and human traffic statement on the Wealthtime Group intranet to remind our people of their obligations in supporting our commitment to combatting modern slavery and human trafficking.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, our focus for the next financial year will be to further refine our approach, provide training on modern slavery and continuously enhance our due diligence processes so that we can identify modern slavery risks as early as possible.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Slavery and Human Trafficking Statement for the financial year ending 31 December 2023 and was approved by the board on 23 May 2024 and signed on its behalf by Patrick Mill, CEO.



If you require this document in an alternative format please contact us.

Wealthtime Limited is a limited company registered in England and Wales. No. 06016480. Registered Office: 1 London Road Office Park, London Road, Salisbury SP1 3HP. Wealthtime Limited is authorised and regulated by the Financial Conduct Authority. FCA Number 468461.

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